

19/12/2018

For the attention of Kevin Hughes:

Dear Kevin,

TOWN AND COUNTRY PLANNING ACT 1990
DEDDF CYNLLUNIO GWLAD A THREF 1990

PROPOSAL:

**EXTENSION AND CONVERSION OF EXISTING REAR GARAGE TO FORM 2 NO. ONE
BEDROOM HOLIDAY ACCOMMODATION UNITS**

LOCATION:

The Buck House Hotel, High Street, Bangor-On-Dee, Wrexham

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 11/12/2018.

We have significant concerns with the proposed development as submitted. We recommend that you should only grant planning permission if the scheme can meet the following requirements. We would object if the scheme does not meet these requirements.

Requirement 1: FCA is submitted which demonstrates compliance with the requirements of A1.14, A1.15 and A1.12 of TAN15.

Flood Risk

The application site lies entirely within Zone C1 as defined by the Development Advice Map referred to under TAN 15 Development and Flood Risk (July 2004), and is shown to be located within the 1% (1 in 100) annual exceedance probability (AEP) event flood outline on the NRW Flood Risk Map. The site is located approximately 90 m east of the River Dee. The site lies within the historic flood map outline for the River Dee flood event in 1964, which occurred due to overtopping of defences.

We note that the proposals are for the extension and change in use of an existing garage (which is used for storage purposes) to form two 1 bedroom holiday accommodation units. The proposals would therefore result in two new 'highly vulnerable' units being located in Zone C1.

Given the nature of the proposals and the C1 designation a Flood Consequences Assessment (FCA) needs to be prepared in support of this application. In the absence of a FCA, we therefore raise significant concerns with this application.

The FCA for the proposed development will need to demonstrate compliance with the requirements of section 6, 7 and Appendix 1 of TAN15. The FCA will also need to take the following into consideration:

- Technical guidance documents OGN100, GN008, and GN028 modelling for flood consequences assessments available on our website:
<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/development-and-flood-risk/?lang=en>
- Welsh Government guidance 2016 CL-03-16 for climate change allowances and the lifetime of the development:
<https://gov.wales/topics/planning/policy/policyclarificationletters/2016/cl-03-16-climate-change-allowances-for-planning-purposes/?lang=en>

The FCA would need to assess the impacts from all sources of flood risk. Fluvial flood risk from the River Dee will need to be assessed and given that the site benefits from the presence of a raised earth embankment defence located to the north / east of the site, we would expect the impact of a breach in the River Dee defences to be assessed, to quantify the impact of defence failure at the site. We would also expect an assessment of a potential blockage to the Old Dee bridge to be assessed within the FCA, including the impact a blockage could have on increasing the probability of a breach event.

The design events that should be considered are the 1% AEP breach/blockage event with an allowance for climate change for assessing compliance with A1.14 of TAN15 and the 0.1% (1 in 1,000) AEP breach/blockage event for assessing compliance with A1.15 of TAN15. The FCA would need to demonstrate that the proposals would not result in any increased flood risk elsewhere, in accordance with the requirements of A1.12 of TAN15.

There is an existing model available for the River Dee adjacent to Bangor-on-Dee, which may be used as a starting point for further assessment. This can be requested through datadistribution@cyfoethnaturiolcymru.gov.uk. The FCA should consider any limitations of the existing 2012 Bangor-on-Dee model, and should assess whether any updates are required in order to refine the model (e.g. updates to hydrology or floodplain topography).

Based on the above, we raise significant concerns and request that a FCA is submitted which demonstrates compliance with the requirements of A1.14, A1.15 and A1.12 of TAN15.

If, contrary to the requirements of TAN15, your Authority is minded to grant permission contrary to our advice, we should be informed of all matters that influence this decision, prior to granting permission, allowing sufficient time for further representations to be made.

Protected Species

We note that there is no information about protected species with the application and, therefore, are assuming that your Authority has screened the application and concluded that there is not a reasonable likelihood of protected species being present.

Please do not hesitate to contact us if you require further information or clarification on any of the above.

Our comments above only relate specifically to matters that are listed in our 'Consultation Topics' document (September 2018) which is published on our website: (<https://cdn.naturalresources.wales/media/686847/dpas-consultation-topics-august-2018-eng.pdf?mode=pad&rnd=131819256840000000>). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance.

Yn gywir / Yours sincerely,

Daniel Davies

Daniel Davies

Cynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales